

CONTINUATION OF CRIMINAL COMPLAINT

INTRODUCTION

1. I have been a Special Agent of the Federal Bureau of Investigation (FBI) for almost 15 years. I am currently assigned to the Detroit Division of the FBI, Traverse City Resident Agency, located in Traverse City, Michigan. My duties include the investigation of various violations of federal criminal law, including matters involving bank robbery. The statements in this Continuation of Application for a Criminal Complaint and Arrest Warrant are based in part on information from the Benzie County Sheriff's Office, Grand Traverse County Sheriff's Office, Leelanau County Sheriff's Office, Traverse City Police Department, Michigan State Police, Traverse Narcotics Team, Leelanau County Prosecutor's Office, and my personal observations, records and documents obtained from subpoenas, information from witness, and my experience and training as a Special Agent of the FBI. This Continuation of Application for a Criminal Complaint and Arrest Warrant is intended to merely show there is probable cause for the requested warrant and does not set forth each and every fact known to me concerning this investigation.
2. I am a "federal law enforcement officer" within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure.
3. This continuation statement is in support of an Application for a Criminal Complaint and Arrest Warrant for WILLIAM FRANCIS MINORE, a 70-year-old man, for bank robbery. The information in the continuation statement establishes probable cause that MINORE robbed three banks from April of 2015 thru September 2016 in violation of Title 18, United States Code, Section 2113(d), which criminalizes the taking of anything of value in the care, custody, control, management, or possession of a bank by force, violence, or

intimidation while using a dangerous weapon. The information in the continuation also establishes probable cause that MINORE used a firearm in furtherance of each bank robbery, in violation of Title 18, United States Code, Section 924(c).

FACTS SUPPORTING PROBABLE CAUSE

4. On September 7, 2016, an armed robber took over the Huntington Bank in Empire, Michigan, pointed a silver revolver at tellers, and forced one teller to empty the bank's vault into a black duffel-type bag.
 - a. Approximately thirty minutes before the robbery, MINORE was recorded on video approaching a silver Kia Soul, stealing it, and driving it away from its location in Glen Arbor, Michigan. A surveillance camera affixed to Art's Tavern in Glen Arbor captured video of MINORE strolling through the area looking at parked cars while carrying black gloves on a summer like day, and then entering the stolen Kia Soul with gloves on. Video of the Huntington Bank robbery shows that the robber is wearing similar black gloves.
 - b. Investigators located video footage taken from an ATM machine at another bank in Empire, which filmed traffic on the road corresponding with the approach from Glen Arbor to the robbed Huntington Bank. The video depicts a silver Kia Soul matching the description of the stolen vehicle coming into town shortly before the robbery and traveling back towards Glen Arbor shortly after the robbery. Faint tire impressions found in an alley behind the robbed Huntington Bank are consistent with the stolen Kia Soul's tires.
 - c. Video from Huntington Bank captured the robber entering with a silver revolver. A subsequent records check for MINORE revealed that he currently has a silver .38

revolver registered to him. A search of MINORE's residence yielded two holsters and ammunition suitable for this weapon.

- d. Video from Huntington Bank also reveals that the robber was wearing shoes similar to those worn by MINORE in the video of him stealing the silver Kia Soul shortly before the robbery.
- e. Video from Huntington Bank also shows the robber using a black, duffel-type bag. A similar bag was recovered from MINORE's van during the execution of search warrant following his arrest the day after the robbery.
- f. Shortly before the robbery, a diversionary call was placed to 9-1-1 and the caller stated a man entered a school and shot his daughter, is shooting other people, and the call abruptly ends. A second diversionary call was placed to 9-1-1 and the caller indicated a man entered the Lake Ann Bank wearing a ski mask and the call abruptly ends. A chorus of people familiar with MINORE identified the voice as his in the Huntington Bank diversionary calls, including bank employees, land contract vendees who were purchasing MINORE's property, MINORE's sister, the mother of MINORE's children, MINORE's daughter, and MINORE's co-worker.

5. On April 22, 2015 and December 28, 2015, the Honor State Bank in Lake Ann, Michigan was robbed.

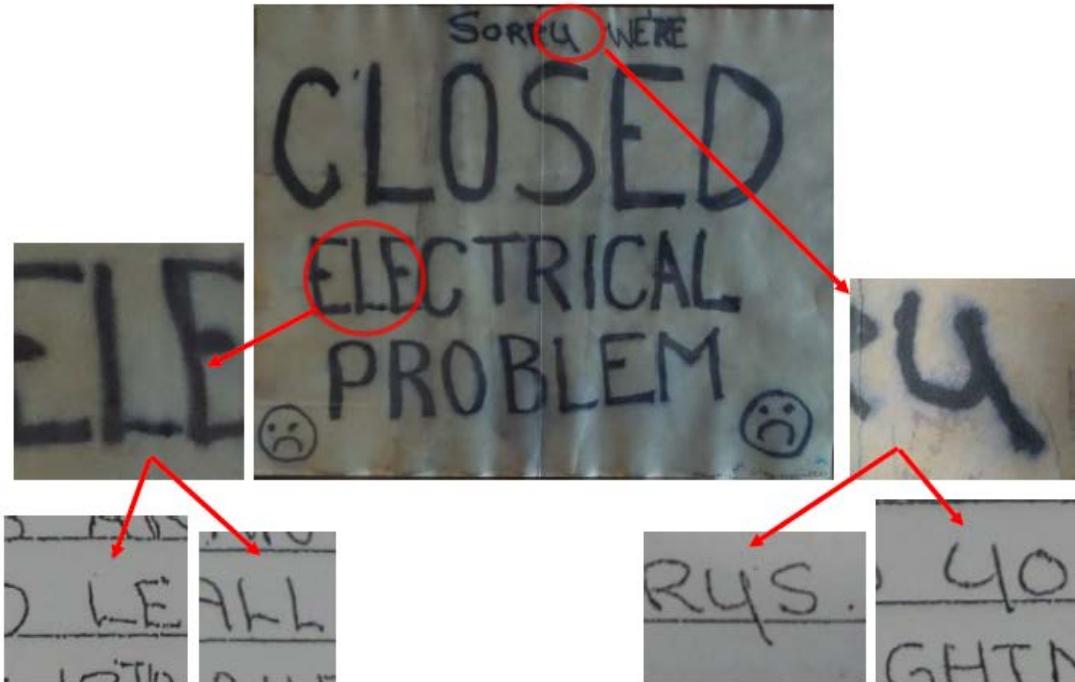
- a. Like the Huntington Bank robbery, the Honor State Bank robberies involved a man wearing a ski mask who took over the entire bank, neutralized personnel, and accessed monies, which were held in the vault or safe as opposed to merely a teller's drawer.

- b. Also like the Huntington Bank robbery, the robber of the Honor State Bank carried a silver short-barreled .38 revolver style pistol with black grips during each robbery of the Honor State Bank. In two of the robberies, the robber laid the gun down. As noted above, MINORE had a .38 revolver registered to him.
- c. A soft black bag was used during the commission of all three robberies. A similar bag was recovered from MINORE's van during the execution of search warrant following his arrest.
- d. Like the September 7, 2016 robbery of the Huntington Bank, the Honor State Bank robberies involved diversionary 9-1-1 calls immediately before the robberies. Each call was placed with a "burner" or "throw away" phone.
 - i. Prior to the April 22, 2015 robbery, three diversionary calls were made to county 9-1-1 call centers in counties that are adjacent to one another. In Benzie County the caller reported a robbery at a gas station; in Leelanau County the caller reported a robbery at a grocery store; and in Grand Traverse County the caller reported a bank was being robbed. All three calls were reported as crimes in progress.
 - ii. For the bank robbery December 28, 2015, one call was made to Benzie County 9-1-1, and the caller reported talking to his daughter on the telephone and her boyfriend shot her and the caller heard shots.
 - iii. The calls confirm that the robber is likely the same for all three robberies. Prior to the Huntington Bank robbery, there were two calls: one claiming someone robbed the Lake Ann Bank and one claiming the caller's daughter was shot. Prior to the April 22, 2015 Honor State Bank robbery, three calls

claimed robberies were in progress, including one of a bank. Prior to the December 28, 2015 robbery, the caller claims his daughter was shot.

- iv. As noted above regarding the Huntington Bank robbery, a chorus of people familiar with MINORE identified the voice as his in the Honor State Bank diversionary calls.
- v. MINORE's attempt to disguise his voice in these calls further defines the similarities among them. All of the calls end before the caller can provide identifying information supposedly because of the alleged pending emergency. In each of them, the caller has a feigned panicked stutter and an irregular breathing pattern.
- vi. Known recordings of MINORE's voice—gathered through police interviews, jail telephone calls, and interviews MINORE granted to local news outlets—also sound strikingly similar to the voice heard making the 7 diversionary 9-1-1 calls.
- e. An examination of proximity using Google Maps reveals the Honor State Bank in Lake Ann was roughly 21.5 miles northeast of MINORE's residence, while the Huntington Bank in Empire was 20 miles North from MINORE's residence.
- f. In the December 28, 2015 robbery, a World War II era pineapple style hand grenade was used by the robber to force employees away from the vault. A search of MINORE's abandoned camper uncovered a similar World War II era pineapple style hand grenade.
- g. The Honor State Bank robber from April 22, 2015 had a teller place a sign in the window, which read "Sorry we're closed Electrical Problem." When the characters

"L" and "y" from the sign are compared to the same characters in a letter MINORE authored to TV 9&10 reporter Caroline Powers, they appear similar:



6. Honor State Bank and Huntington Bank were insured by the Federal Deposit Insurance Corporation at the time they were robbed.

SUMMARY

7. Based upon the facts set forth above, I respectfully submit that there is probable cause to believe that WILLIAM FRANCIS MINORE has committed three violations of 18 U.S.C. § 2113(d) and three violations of 18 U.S.C. § 924(c) in the Western District of Michigan.